# IN THE UITED STATES BANKRUPCY COURT WESTERN DISTRICT OF PENNSYLVANIA (PITTSBURGH)

IN RE: MELISSA A. HOFFMAN, NKA MELISSA A. WEYDENER	) CHAPTER 13 CASE NO.: 20-22760-GLT
DEBTOR.	JUDGE GREGORY L. TADDONIO
PLANET HOME LENDING, LLC,	)
MOVANT.	)
MELISSA A. HOFFMAN, DEBTOR, AND RONDA J. WINNECOUR., TRUSTEE,	) ) )
RESPONDENTS.	) )

## RESPONSE TO DEBTOR'S MOTION TO VOID NOTICE OF MORTGAGE PAYMENT CHANGE [D.E. 108]

COMES NOW Planet Home Lending, LLC ("Secured Creditor"), and files this written response to the Debtor's Motion to Void Notice of Mortgage Payment Change [D.E. 108] (hereinafter "Debtor's Objection"), and as grounds therefor states:

- Secured Creditor holds a secured Claim against Debtors property located at 202 Wylie
   Avenue, Strabane, PA 15363 (hereinafter the "Property") in the approximate amount
   of \$75,154.27 as of the date of filing the Proof of Claim (Claim #7-1) on November 5,
   2020.
- 2. Secured Creditor filed a Notice of Mortgage Payment Change for the above referenced Claim 7-1 on or about December 5, 2024.
- 3. Debtor filed Motion to Void Notice of Mortgage Payment Change on July 9, 2025 wherein Debtor requests that the Court void the Notice of Mortgage Payment Change and for the Court determine that the escrow deficiency was paid in full.
- 4. Secured Creditor needs additional time to review its records to confirm the escrow

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payment and to further respond to the allegations contained in Debtor's Motion.

 Secured Creditor reserves the right to supplement its response and/or file an Amended Notice of Payment Change.

WHEREFORE, Planet Home Lending, LLC requests that this Court deny Debtor's Motion to Void Notice of Mortgage Payment Change [D.E. 108] and grant such other and further relief as the Court deems just and proper.

DATED this 23rd day of July 2025

Respectfully submitted,

/s/Joshua Goldman

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### **CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that a true and correct copy of the foregoing has been furnished to the parties on the attached Service List by electronic notice and/or by First Class U.S. Mail on this 23<sup>rd</sup> day of July 2025:

#### **DEBTOR**

MELISSA A. HOFFMAN 202 WYLIE AVENUE STRABANE, PA 15363

#### ATTORNEYS FOR DEBTOR

BRIAN C. THOMPSON THOMPSON LAW GROUP, PC 301 SMITH DRIVE SUITE 6 CRANBERRY TOWNSHIP, PA 16066 BTHOMPSON@THOMPSONATTORNEY.COM

#### **TRUSTEE**

RONDA J. WINNECOUR SUITE 3250, USX TOWER 600 GRANT STREET PITTSBURGH, PA 15219 CMECF@CHAPTER13TRUSTEEWDPA.COM

#### U.S. TRUSTEE

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/s/ Joshua Goldman

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